

# ALLOWABLE EXPENDITURES & SUBMITTING REQUESTS FOR REIMBURSEMENT

Lori Adams, Administrative Specialist Shane Rhian, Financial Services Director Diane Stuehmer, Federal Programs Director



### What Expenditures are Allowable?

- For Federal programs, the expenditures MUST be supplemental in nature
- Federal funds cannot pay for anything that is required of state and/or local funds
- Typically, federal funds can't provide for core instructional services
- Costs must be reasonable and necessary for meeting the needs of the grant program



# What is considered "Reasonable and Necessary?"

- Will it further the goals of the program?
  - If a Title I Schoolwide Program, will it support the strategies identified in the Schoolwide plan?
- Does it have a clearly demonstrative and legitimate purpose?
- Is the cost nominal and prudent?
- Is cost justifiable?



### Other Questions to Consider

- Could the proposed expenditure be interpreted as "paying" for participation (attendance) or for achievement (scores on tests)?
  - If the answer is yes, then Federal funds cannot be used
- Is it supplementing, not supplanting district efforts?
  - Are funds (other than Federal) used to provide this cost in other non-Federal programs or activities?
- Can we have an effective Title \_\_\_ program without these items?



### Food and Beverages

- Generally, food/beverages are not allowable using Federal grant funds
  - In very rare cases, food purchases for conferences and meetings are allowable, albeit there is a very high burden of proof for expending Federal funds to purchase food/beverages



## What About Prizes, Incentives, or Rewards?

- Not specific in law
- Best advice:
  - Use funds from other sources unless a Federal program's guidance specifically approves it
  - If Federal funds are used, include justification / rationale on the documentation submitted for payment (This does NOT ensure that the expense will be allowed)



### Title I Allowable Expenditures

- Services and materials that are supplemental are usually allowed
  - Title I (Targeted Assistance)
    - Supplemental teachers, materials, services, etc. for identified students
  - Title I (Schoolwide)
    - Funds are supplemental
    - Must be educational in nature and support the Schoolwide plan



### Title I NON-ALLOWABLE Expenditures

As approved by the Committee of Practitioners

- Prizes and/or cash rewards
- Entertainment per OMB Circular A-87
  - Cost of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities
  - Cakes, balloons, crowns, leis, cowboy hats, dog tags, bracelets, t-shirts, hats, rings, tattoos, whistles, candy, ice cream, soda pop, trinkets, etc. (This is not an inclusive list, but rather a sampling of the types of items for which districts will not be reimbursed.)



### Title I NON-ALLOWABLE Expenditures (cont.)

As approved by the Committee of Practitioners

- Conference attendance that doesn't support the Title I program/plan
- Prepaid gift/cash cards (e.g. Amazon, iTunes, Wal-Mart, convenience stores, etc.) because non-educational items could be purchased. Direct purchases from these companies will be considered if the item(s) are appropriate to support the Title I program, but using gift cards to make purchases will not be allowed. (Very difficult matching up the purchases of the gift-cards with the actual items that are purchased. Sometimes the gift cards are purchased in one grant period and not spent until the following grant period.)



### Title I NON-ALLOWABLE Expenditures (cont.)

As approved by the Committee of Practitioners

- Door prizes
- Parent involvement activities that don't actually involve the parents (e.g. reward ceremonies/celebrations in which parents are invited to attend). Parent involvement activities MUST involve the parents. They cannot simply be in the audience—not participating.
- Food for Parent/Teacher Conferences



### Title II-A Allowable Expenditures

- Class-size reduction teachers (must be justifiable)
- Professional development (public and nonpublic)
  - Content knowledge
  - Effective instructional strategies
  - Training in
    - Effectively integrating technology;
    - Teaching students with different needs, disabilities, and limited English proficiency;
    - Methods of improving student behavior, identifying early interventions, and involving parents;
    - Leadership development and management; and
    - Use of data and assessments to improve instruction and student outcomes



### Title II-A Allowable Expenditures (cont.)

- What about equipment and materials?
- Allowable uses:
  - DVDs that are part of an allowable professional development program and that serve to reinforce the professional development provided
  - Reference books that are part of the provided professional development; however if they are intended to be part of the general professional development library and are NOT part of the professional development itself, they would not be an allowable expenditure

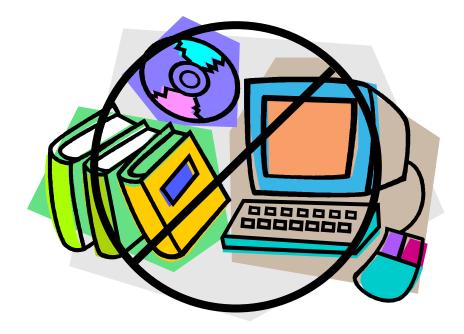


### **NON-ALLOWABLE** Title II-A Expenditures

Text books

Purchase of technology, including computers,

laptops and iPads





### Title III (English Language Acquisition)

#### Required activities:

- High-quality language instructions
- Professional development is a REQUIRED activity



#### **Authorized (Allowable) LEP Activities**

- Upgrading program objectives and instructional strategies
- Identifying, acquiring, and upgrading curricula, instruction materials, and educational software
- Providing tutorials and intensified instruction
- Coordinating the ELL programs with other relevant programs/services
- Improving English proficiency and academic achievement
- Providing community participation programs, family literacy service, and parent outreach activities to assist parents in becoming active participants in helping their children improve academically
- Improve instruction by acquisition/development of educational technology/instructional materials, electronic networks for materials, training, and communication

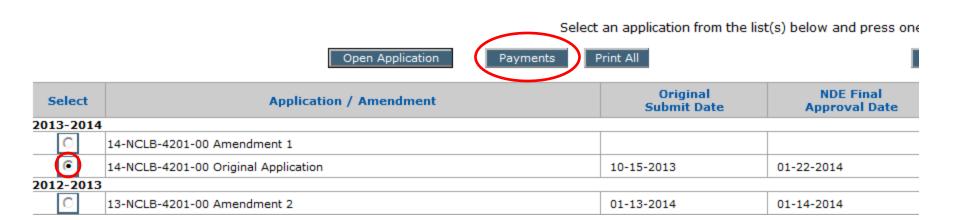


#### **Authorized (Allowable) Immigrant Activities**

- Family literacy, parent outreach, and training activities designed to help parents become active participants in their children's education
- Support for personnel, including teacher aides, who have received training to provide services for immigrant children
- Tutorials, mentoring, academic, or career counseling
- Identification and acquisition of curricular materials, educational software, and technologies to be used in the program
- Basic instruction services (supplies, costs of transportation)
- Other services, including services designed to introduce students to the educational system and civics education
- Activities coordinated with community-based organizations, institutions of higher learning, private sector entities with expertise in working with immigrants to assist parents by offering community services



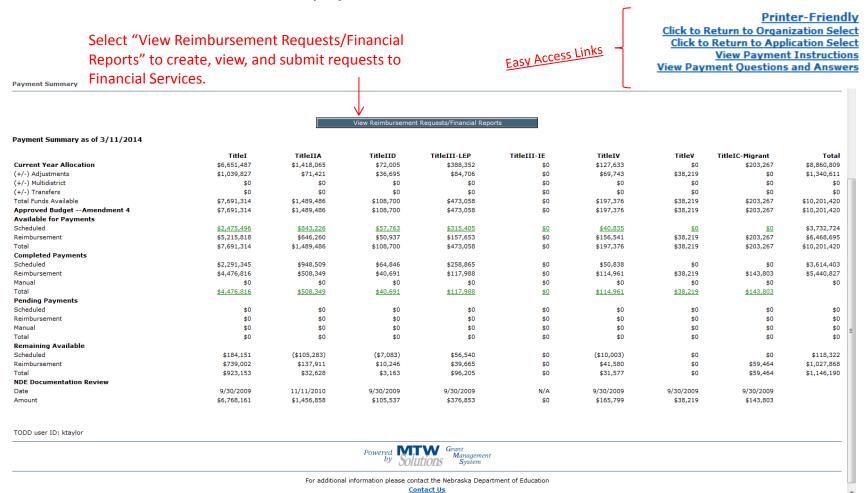
### What is the Process for Requesting Reimbursement?





### Payment Summary

The Payment Summary is a snapshot of the current status of payments and allocations.



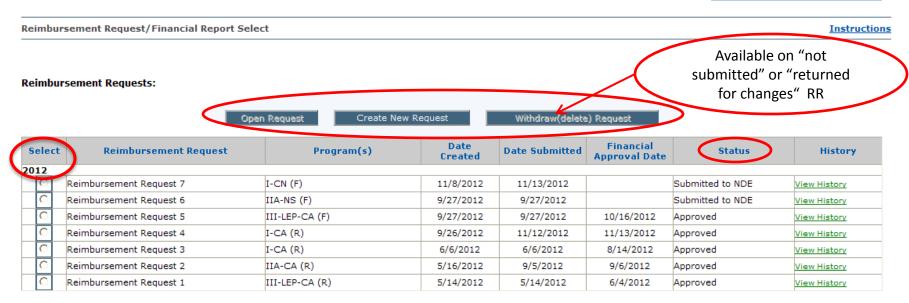


### Reimbursement Request/ Final Select

Application: 2011-2012 NCLB Consolidated - 00

Cycle: Amendment 1

Printer-Friendly
Click to Return to Application Select
Back to Payment Summary
View Payment Instructions
View Payment Questions and Answers





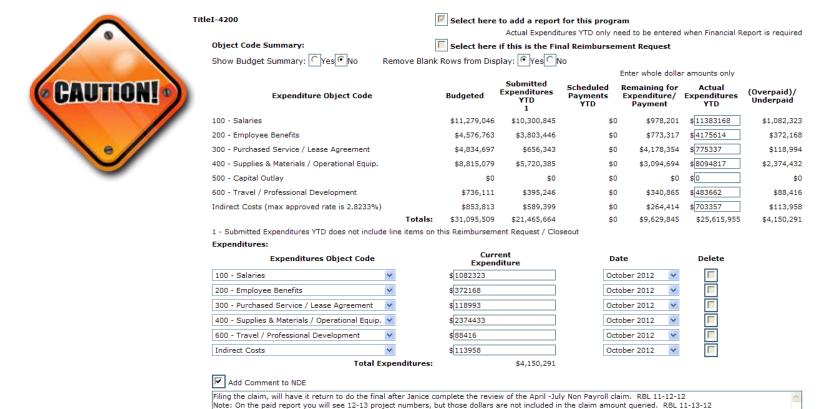
### Reimbursement Requests and Finals

LEA Contact: First Name: Phone: Email Address:	Kiley  kiley.taylor@nebraska.gov	Last Name: Ext:	Taylor						
2014 NCLB Consolidated - 42	201								
TitleI-4200	se	elect here to add a report for this program							
TitleIIA-4310	□ Se	elect here to add a report for this program							
TitleIID-4985	☐ Se	elect here to add a report for this program							
TitleIII-LEP-4925	□ se	elect here to add a report for this program							
TitleIII-IE-4926	□ se	elect here to add a report for this program							
TitleIV-4960	□ se	elect here to add a report for this program							
TitleV-4320	□ Se	elect here to add a report for this program							
TitleID-4230	□ se	elect here to add a report for this program							
			ts and save prior to submission						
		Attach Document	Browse						
			ave Page						
Check here if documentation has been sent to NDE via Mail									



#### Reimbursement Request – by Object Code

2012 NCLB Consolidated - 4201



Add Comment to LEA

7/29/2014 21



### Required Documentation

- Object code inconsistencies between the budget and supporting documentation may require either a budget amendment or journal entry.
- Must include detailed transaction level information (i.e., Expenditure Audit Report, Account Inquiry, Fund Audit Report...) may include account, object code, vendor name, date paid, check number, amount and description of transaction.



### Required Documentation

- Salaries need to include names and should be listed on the application under the Staff Tab (omission of staff information may require amendments to the application)
- Journal Entries, Petty Cash Accounts, Bank Card/Credit Card, and travel reimbursements – need original detailed transaction information with description of transaction.



### Required Documentation

SELECTED Data	Expenditure Audit Report	Arranged by:
Date Range: 03/01/2011 thru 08/31/2011		Account Number

Date	Src	P/O	Check	Invoice	Vendor	Description	Disbursed
1	GEN	ERAL FUND					
1-4265-1	10-0		Salaries -	Title IV			
08/15/20	11 AP		00006249	080111	Vendor Name	Salaries	70.00
08/15/20	11 AP		00006294	080111	Vendor Name	Salaries	70.00
08/15/20	11 AP		00006298	080111	Vendor Name	Salaries	70.00
08/15/20	11 AP		00006327	080111	Vendor Name	Salaries	85.00
1-4265-110-0		Account	295.00				
1-4265-110-1		Salaries -	Title IV				
08/02/20	11 GL		00000802		BERNHEA	Salaries	100.00
1-4265-110-1		Account	Account Totals:				
1-4265-2	10-1		Fica				
08/15/20			00006332	3FICM.340	Wells Fargo Bank	Normal Payroll 08/19/2011	1.46
08/15/20			00006332	3FICA.340	Wells Fargo Bank	Normal Payroll 08/19/2011	6.23
1-4265-2					THE BUSINESS CHARGES OF A POST AND THE BUSINESS SERVICES OF THE POST AND THE POST A	7.69	
1-4265-2	20-1		Fica				
08/15/20	11 AP		00006282	3NTRT.340	Payroll Account	Normal Payroll 08/19/2011	8.36
1-4265-2					•	8.36	
1-4265-3	18-0		Contracte	0.00			
1-4265-3	18-4		GA Contracted Services				0.00
1-4265-3			CC Contracted Services				
							0.00
1-4265-4			Supplies		Dromotional Concents	Drug froe day/l eadership	102.35
08/15/20			00006256	98441		Drug free day/Leadership Leadership camp	19.71
08/15/20			00006291	50640 T-4-1-1	Quality Printing	Leadership camp	122.06
I-4265-410-1			Account	122.06			



### The Following Expenditures ALWAYS Require Supporting Documentation

- Credit card purchases
- Travel expenditures related to a conference requires adequate documentation
- Title I allows the provision of food for Parent Involvement activities, but limits the food to "light refreshments" and requires an agenda or other supporting documentation (NOTE: Title I funds cannot be used for purchasing candy)



### The Following Expenditures ALWAYS Require Supporting Documentation (cont.)

- Petty-cash purchases
- Reimbursement to individuals
- Field trips always require adequate documentation which includes the educational value



#### **NEW** for 2014-15

- Consolidated programs requests will no longer be available
- Districts will request reimbursement for each program separately



### How Often Should Requests for Reimbursement be Submitted to NDE?

- Frequency of requests is up to the district
- NDE recommends at least quarterly requests



### Can Requests for Salaries and Benefits be Separate from Other Expenditures?

 Yes, districts may submit requests for salaries and benefits on one request and submit a separate request for the same time period for other expenditures



#### **Grant Period**

- Typically grants are awarded July 1 of one year and go thru September 30 of the following year
- Final Requests for Reimbursement are due to NDE by November 15 and can include expenses thru September 30
- If all grant funds are expended before that time, a Final Request for Reimbursement can be submitted when the last of the funds are spent
- For programs that allow carryover, unspent funds will be available with the next year's grant funds and is listed as "carryover" on the Allocations page
  - Title I-A has a carryover limitation of 15% for grants > \$50,000